

**Qwest**

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Daphne E. Butler
Senior Attorney

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW B-204
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Qwest Corporation Section 63.71 Application to Discontinue
DS1 and DS3 Radio Interface Service – WC Docket No. 05-178

Dear Ms. Dortch:

On April 15, 2005 Qwest Corporation (Qwest) filed its Section 63.71 Application to Discontinue its DS1 and DS3 Radio Interface services from Sections 7.11.1 and 7.12.1 of Qwest's Tariff FCC No. 1. Qwest subsequently received questions from the staff wanting to know: 1) whether the services to be cancelled were truly wireline services; and 2) whether this application needs to be coordinated with the Wireless Telecommunications Bureau because of the radio interface.

As to the first question, in both the DS1 and DS3 Radio Interface services, the communication is a point-to-point private line service designed to be carried from the customer's premises to the Qwest serving wire center over a microwave link. The intent of the product is to be able to provide a DS1 or DS3 service to a customer's location too remote to be connected by a traditional copper loop. For the connection from the Qwest serving wire center to another location, the customer would choose a traditional wireline service from Qwest's tariff.

As to the second question, ordinarily Qwest would answer in the affirmative since the radio interface service is carried from the Qwest serving wire center over a microwave link to the customer's premises. This service, once requested by the customer, may very well require a license for the microwave on the customer's premises and possibly for the microwave route from the Qwest serving wire center to the customer's premises. However, Qwest has never installed the necessary facilities for the service, since we have not had a request for the service from the time it was tariffed. So, even though there could have been a possible need for a radio license, one was never needed or requested. Therefore, there is no need to coordinate the current Section 63.71 Application with the Wireless Bureau because the only thing that will be changing once the application is approved is the tariff itself.

Respectfully submitted,

/s/ Daphne E. Butler

cc: Denise Coca, via e-mail at denise.coca@fcc.gov
and attached Service List

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **LETTER** to be
1) filed, via the FCC's Electronic Comment Filing System in WC Docket No. 05-178, 2) served
via electronic mail on Ms. Denise Coca at denise.coca@fcc.gov, and 3) served, via First Class
United States mail, postage prepaid, on the parties listed on the attached service list.

/s/Richard Grozier

April 29, 2005

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